

Hearing Date: May 18, 2011
Objections Deadline: May 11, 2011

LAW OFFICES OF JEROME ZAMOS
Jerome Zamos (Cal. State Bar No. 36246)
Admitted Pro Hac Vice
5228 Campo Road
Woodland Hills, California 91364-1927
Telephone: 818-348-6095
Facsimile: 818-348-6095
email: zamoslaw @ aol.com

Attorneys for Real Party in Interest
PRUDENCE WALTZ

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:	Case No. 08-13555 JMP
LEHMAN BROTHER'S HOLDING, INC., a Delaware Corporation	Chapter 11
Debtor	[jointly administered]

REQUEST BY COUNSEL FOR REAL PARTY IN INTEREST PRUDENCE WALTZ [JEROME ZAMOS] TO APPEAR TELEPHONICALLY ON MOTION NOTICED FOR HEARING ON MAY 18, 2011 REQUESTING AN ORDER PURSUANT TO 28 U.S.C. § 1334(c)(2) ABSTAINING FROM ANY FURTHER ACTIONS OR PROCEEDING IN THIS COURT WHICH INTERFERES WITH THE PENDING STATE COURT ACTION IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES [BC 374163] AND CLARIFYING THE ORDER ENTERED HEREIN ON DECEMBER 22, 2010 MODIFYING THE AUTOMATIC STAY IN THIS CASE WITH REFERENCE TO THE REAL PROPERTY COMMONLY KNOWN AS 844-846 WEST 57TH STREET, LOS ANGELES, CALIFORNIA

THE UNDERSIGNED JEROME ZAMOS declares that if called as a witness in the above referenced proceeding would competently testify based upon personal knowledge as to each of the following facts.

1. I am now, and have at all times herein mentioned acted as counsel for REAL PARTY IN INTEREST PRUDENCE M. WALTZ [hereinafter referred to as "WALTZ"] in the action now pending in THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES [hereinafter referred to as "THE CALIFORNIA COURT"] actions BC 374163 [hereinafter referred to as "THE PENDING STATE COURT ACTION"].

2. My office and residence are located in Woodland Hills, California which make it inconvenient to appear for a hearing in New York on May 18, 2011 in connection with the motion I am filing concurrently on behalf of PRUDENCE M. WALTZ for an order 28 U.S.C. § 1334(c)(2) and Bankruptcy Code §§ 362(d) and 362(e) in connection with her pending state court action to quiet title and recover possession of the real property commonly known as 844-846 WEST 57TH STREET, LOS ANGELES, CALIFORNIA In THE PENDING STATE COURT ACTION WALTZ.

3. Based upon the foregoing I am requesting that I be allowed to appear telephonically in connection with the motion I am filing concurrently and noticing for hearing at 10:00 am on the morning of May 18, 2011 for an order 28 U.S.C. § 1334(c)(2) and Bankruptcy Code §§ 362(d) and 362(e) on behalf of Prudence Waltz.

Dated: Woodland Hills, California
April 7, 2011

LAW OFFICES OF JEROME ZAMOS

By: _____
Jerome Zamos, Attorneys for
Real Party in Interest PRUDENCE WALTZ
5228 Campo Road
Woodland Hills, California 91364-1927
Telephone: 818-348-7151
Facsimile: 818-348-6095
email: zamoslaw@aol.com

ORDER

Good Cause Appearing it is so ordered and COUNSEL FOR PRUDENCE WALTZ may appear telephonically before this Court on her behalf on the morning of May 18, 2011 in support of her motion for an order 28 U.S.C. § 1334(c)(2) and Bankruptcy Code §§ 362(d) and 362(e).

Dated: New York, New York

April ___, 2010

UNITED STATES BANKRUPTCY JUDGE

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of LOS ANGELES, State of CALIFORNIA. I am over the age of 18 and not a party to the within action; my business address is 5228 Campo Road, Woodland Hills, California 91364-1927.

On April 7, 2011 I served the following document(s) described as REQUEST BY COUNSEL FOR REAL PARTY IN INTEREST PRUDENCE WALTZ [JEROME ZAMOS] TO APPEAR TELEPHONICALLY ON MOTION NOTICED FOR HEARING ON MAY 18, 2011 REQUESTING AN ORDER PURSUANT TO 28 U.S.C. § 1334(c)(2) ABSTAINING FROM ANY FURTHER ACTIONS OR PROCEEDING IN THIS COURT WHICH INTERFERES WITH THE PENDING STATE COURT ACTION IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES [BC 374163] AND CLARIFYING THE ORDER ENTERED HEREIN ON DECEMBER 22, 2010 MODIFYING THE AUTOMATIC STAY IN THIS CASE WITH REFERENCE TO THE REAL PROPERTY COMMONLY KNOWN AS 844-846 WEST 57TH STREET, LOS ANGELES, CALIFORNIA on the interested parties by placing a true copy thereof enclosed in a sealed envelope with postage fully prepaid addressed to:

Shai Y. Weisman, Esq.
Jacqueline Marcus, Esq.
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153

Andrew D. Velez-Rivera, Esq.
Office of the U.S. Trustee
33 Whitehall Street
21st. Floor
New York, NY 10004

Dennis F. Dunne
Milbank, Tweed, Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, NY 10005

[Counsel for AURORA LOAN SERVICES]
GARRETT & TULLEY, P.C.
CANDIE Y. CHANG, Esquire
STEPHANIE S. BANG, Esquire
225 South Lake Avenue, Suite 1400
Pasadena, California 91101-4869

[COUNSEL FOR REAL PARTY LEHMAN BROTHER'S HOLDING, INC.]
Justin D. Balser, Esquire
Donald M. Scotten, Esquire
Bryan M. Leifer, Esquire
AKERMAN SENTERFITT LLP
725 S. Figueroa St., Suite 3800
Los Angeles, CA 90071

CHAMBERS OF THE HON. JAMES M. PECK
THE UNITED STATES BANKRUPTCY COURT
Southern District of New York
Courtroom 601
One Bowling Green
New York, New York 10004-1408

MOHAMED FOUZI HAFFER, Esquire
Haffar Law Firm
555 W Beech St Ste 503
San Diego, CA 92101

BLUE OCEAN MORTGAGE, INC.
c/o MATTHEW P KAY
[its agent for service]
4347 McCONNELL
LOS ANGELES, CA 90066

JANELLE M. BAIRD
P.O. Box 1812
Hawaiian Gardens Ca, 90716

Samantha Hill
1201 N. Orange Grove Ave., #106
West Hollywood, CA 90046

MATTHEW P KAY
4347 McCONNELL
LOS ANGELES, CA 90066

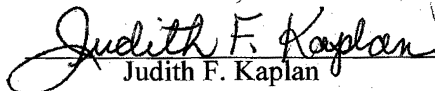
LATOSHIA C. KELLER
4515 Don Ricardo Drive
Los Angeles, California 90008

I am "readily familiar" with the firms practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Woodland Hills, California. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in set forth in this affidavit.

I am employed in THE LAW OFFICES OF JEROME ZAMOS in Woodland Hills, California at whose direction service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed April 7, 2011 at Woodland Hills, California.


Judith F. Kaplan